

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

**IN RE APPLICATION OF DAILANE
INVESTMENTS LIMITED AND
MICHAEL MAILLIS FOR JUDICIAL
ASSISTANCE PURSUANT TO
28 U.S.C. § 1782**

Case No. 22-cv-23619

**DECLARATION OF RICHARD LEDAIN SANTIAGO IN SUPPORT OF
APPLICATION FOR JUDICIAL ASSISTANCE PURSUANT TO 28 U.S.C. § 1782**

I, Richard Ledain Santiago, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a licensed attorney (*Avocat à la Cour*) registered in the List I of the Luxembourg Bar in the Grand Duchy of Luxembourg and a partner with Addleshaw Goddard (Luxembourg) LLP. As set forth in my first Declaration, my firm and I are counsel to Mr. Michael Maillis and Dailane Investments Limited.
2. Under Luxembourg law, claims for breach of fiduciary duty are subject to a five (5) year statute of limitations. Claims for breach of contract have a ten (10) year statute of limitations in commercial matters. Claims for “loss of chance” must be brought within ten (10) years of knowledge thereof in commercial matters.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 25th day of February 2025.



Richard Ledain Santiago